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March 25, 2021

**By ECF**

Honorable Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *PFSS 2020 Holding Company, LLC v. Findlay Estates, LLC*  
U.S. Dist. Ct. S.D.N.Y. Case No. 20-cv-8884 (PAE)

Dear Judge Engelmayer:

We are counsel to Plaintiff PFSS 2020 Holding Company, LLC (“Plaintiff”). We write, in conjunction with counsel for Defendants Findlay Estates, LLC and Sheindy Grunhut (collectively, “Borrower Defendants”), to inform the Court that Plaintiffs and Borrower Defendants appear to have reached a framework for a resolution of the claims between them. Before we are able to confirm, Plaintiff requires certain information from the Borrower Defendants, including the ability to thoroughly inspect the subject property.

Given the approaching Jewish holiday, Plaintiff and the Borrower Defendants respectfully submit that three weeks is an appropriate and necessary amount of time for Plaintiff to receive the information it requires to proceed with a settlement at this time. Therefore, we are respectfully requesting a three-week extension of only those imminently approaching deadlines, namely: (1) to submit to the Court relevant factual updates with respect to Plaintiff’s application for a receiver; (2) to serve initial disclosures; (3) to serve initial requests for the production of documents; (4) to serve initial interrogatories; and (5) for Plaintiff to amend the Complaint to add potential lien holders. We are not requesting to extend any other dates at this time.

If approved, the parties will advise the Court of the results of their discussions no later than April 16. We thank the Court for its consideration.

Respectfully submitted,  
*/s/ alan f kaufman*  
Alan F. Kaufman

Granted.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer". The signature is written in a cursive, flowing style.

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PAUL A. ENGELMAYER  
United States District Judge

March 26, 2021